

Electronic Filing Questions and Answers
Revised August 30, 2011

As a reminder, per the Iowa Administrative Code, all communications with the board shall be addressed to:

Executive Secretary
Iowa Utilities Board
1375 East Court Avenue, RM 69
Des Moines, Iowa 50319-0069

Q1. How do I search for a specific filing in EFS?

A1. In December, 2010, a filing search function was added to EFS. The filing search can help in locating a group of documents submitted together or in looking for information filed by a particular submitter or party. As always, confidential documents will not be viewable in EFS. However, filing-level information about filings that contain confidential documents will be viewable.

Q2. Is it acceptable in the signature line to indicate "s/n" instead of an actual signature or can that be accomplished either way?

A2. A signature designation of "/s/ Name" is required per 199 IAC 14.13. Handwritten signatures are not required in an electronic document because documents showing a handwritten signature are often scanned and not word searchable.

Q3. May I file a document as a PDF?

A3. Documents may be filed in a PDF format. Whenever possible, PDF files must be full-text searchable, making them consistent with 199 IAC 14.5(7) which states that "Any text-based document which has been scanned for electronic filing must be full-text searchable to the extent that is reasonably possible." Documents filed in PDF format should be reviewed by the filer before filing to assure that pages are rotated so they are "right-side-up" when viewed on a computer screen.

Q4. Is a certificate of service still needed? And if so, should it be revised to reflect that pleadings are being served through the IUB electronic filing system to parties able to receive electronic service?

A4. Rule 14.16(1) provides that no additional proof or certificate of service is required in matters in which all parties are able to receive electronic service. For a document that is filed electronically in a case where all the parties are using the EFS, no certificate of service is necessary. Nevertheless, if you want to use a certificate of service for documents filed electronically, you can, and there is no specific wording required. You could use a statement attesting to the fact that service was made in a manner complying with the Board's rules, or, more specifically, that service was made either by U.S. mail or through the Board's electronic filing system.

There are two instances where a certificate of service will be necessary because service will be made outside of EFS: (a) Initial filings should be filed electronically but are not served through EFS to any party other than OCA. So, for initial filings, you will have to serve a paper copy of the document to everyone except the OCA and a certificate of service will be necessary. (b) In cases where someone is participating in a proceeding on paper and is not able to receive service electronically through EFS, you will have to send (serve) them a paper document with a certificate of service. For documents served on paper, you can use the suggested language above or model your certificate after Board rule 2.2(16).

- Q5.** Are cover letters still necessary?
- A5.** Cover letters are necessary. They tell IUB's Records and Information Center what the filing is about. See the [example](#) in Attachment 1 below.
- Q6.** Are transmittal sheets still necessary?
- A6.** No. Please do not file a transmittal sheet. The cover letter should contain the information that would have been on a transmittal sheet. See cover letter example attached.
- Q7.** In new dockets, OCA will automatically receive the document directly from the IUB via the electronic filing system. If there are other parties to the proceeding, do they automatically receive copies too?
- A7.** In all EFS dockets, OCA will receive the notification via EFS. For an initial filing, the filer is required to send the filing to other affected parties. In an established docket, EFS will notify the other parties unless they are unable to be served electronically or unless the information is confidential. Parties are always required to directly serve confidential material on all other parties except OCA. The rules regarding electronic service can be found at 199 IAC 14.16.
- Q8.** The "Summary of Orders and Filings" in EFS is organized differently than the "Daily Summary of Filings and Orders" in the prior environment. Previously all Board orders were grouped together at the beginning of each daily list. Is there an easy way to look at just Board orders on the new listing?
- A8.** One option is to use the Edit/Find function to search for the word "Order" in the summary page. This will navigate from one order to the next order. Another option is to use the document search feature. On the document search page, you can select a document type of "Order". Then you can tailor your search further by selecting a date or date range or by filling in any of several searchable fields.
- Q9.** How do I indicate what company the filing is being submitted for?
- A9.** Because filings may be made for multiple parties, it is necessary to build that list by adding each company. To do that, there is an area in the filing information where submitting party information can be selected or entered. If the company is in the company drop-down list, find and select them, **then click add**. Clicking add inserts the company name into the larger box with a "remove" button next to it. If the company is not in the company drop-down list, type the company name into the text box below the drop-down, then click add. Again, clicking add inserts the company name into the larger box with the "remove" button next to it. Once the larger box has all the submitting parties in it, you can move on to other parts of the form. It is important to remember that you must add the company to the larger submitting party box (**by clicking add**) in order for the information to be saved in the filing information.

Q10. I am submitting several documents in a single filing. Please provide some guidance on naming the filing and documents.

A10. When naming filings and documents, it is important to keep in mind that one great benefit of EFS is the ability to find documents once they are filed. In order to make each document easier to find, names of filings and documents should be descriptive without being verbose.

Remember to be as clear, consistent, concise, and complete as possible within EFS constraints. When a filing contains a single document, it may make sense for the filing title and document title to be the same. However, when a filing contains multiple documents, each document should have a unique name that describes the document itself. See the [Standards for Electronic Information](#) or the [User Guide](#) for examples. For more information about document titles in EFS, see the [Document Titles Report](#), in EFS-2010-0001.

Q11. What are the limits in number of characters for filing titles, document titles, and file names in EFS?

A11. Filing and document titles may be up to 200 characters. The filename for the actual file you attach has an 80-character limit. If the filename is too long, EFS will be unable to process the filing. For example, you might attach a file from C:\My Documents\EFS Documents for Filing\RPU-2009-xxxx\Doe, Dr. John Testimony.doc. This file name is 82 characters long including spaces – too long for EFS to handle. To work around this, shorten the folder names or move the file to a folder closer to the root. For example, shorter folder names might be C:\My Documents\EFSDocs\RPU-2009-xxxx\Doe, Dr. John Testimony.doc, which is 65 characters long. A folder closer to the root might be C:\My Documents\RPU-2009-xxxx\Doe, Dr. John Testimony.doc, which gives a filename that is 57 characters long.

Q12. Regarding compliance filings - since they are not new dockets in or after 2009, but are filed electronically, will OCA be sent an electronic copy or is it necessary for filers to still send to OCA?

A12. Periodic compliance filings made under the Iowa Administrative Code sections for 2009 or after should be filed electronically and will have "docket numbers" like IAC-2009-1904 (where 2009 is the year and 1904 indicates 199 IAC 19.4). OCA will receive notification about those through EFS as they do other dockets. Compliance filings in proceedings continuing on paper should continue to be made on paper.

Q13. If an administrative assistant will be actually uploading the filings into the system, what registered user ID should he/she use?

A13. In order for notification to be provided to the person responsible for the filing and for that person to show on the service list, the attorney or company employee responsible for the filing should be the registered user. The administrative assistant's email may be entered as an alternate email address.

Q14. What are the size limits of the individual computer files when uploading documents or spreadsheets into EFS?

A14. Smaller computer files (documents, spreadsheets, etc.) are better in general than large ones. They are faster to upload and download and quicker to search through. EFS has a practical limit of about 5 MBs per document. Documents larger than that are slow to load for viewing or download. If it is necessary to split a document (computer file) because of size, be sure to name the pieces in a way that makes sense so users can put them back together easily. See [Item 17](#) in Attachment 2 below for more information about submitting groups of documents.

- Q15.** How will users be notified if the EFS system is down?
- A15.** If the outage is expected to last more than 30 minutes and the IUB Web site is available, a notice will be posted on the IUB Web site (<http://iub.iowa.gov>) and, if possible, an email will be sent to registered users. Scheduled maintenance will be posted on the IUB Web site.
- Q16.** What happens if my filing is rejected?
- A16.** If a filing is rejected, Records Center will provide the filer a reason for the rejection. The filer will receive the rejection notice. Notification of a rejected filing will not be provided to other parties on the service list or to the Office of Consumer Advocate (OCA) or IUB staff. All documents in a rejected filing must be re-submitted once the appropriate corrections have been made.
- Q17.** My filing was rejected and I re-submitted it the following day. Does the rejected filing count toward meeting my filing deadline?
- A17.** Only a filing that is accepted for filing on or before the filing deadline will meet the deadline. If a filer is unable to resubmit the filing before the deadline, it should be re-submitted as soon as possible and accompanied by a request to accept a late filing.
- Q18.** I wanted to search for ARB dockets so chose that in the drop-down box but my search results showed RPU's. What happened?
- A18.** For all searches that have drop-down boxes, the drop-down box stays "active" until you click off it or fill in information in another field. While it is active, scrolling your mouse will scroll through the list, highlighting a different choice and possibly giving you an unexpected result. To avoid this, select your choice, then click somewhere else on the screen to lock in your choice. It is also a good idea to review the information you've entered on the search screen before hitting the search button.
- Q19.** How can I search for multiple industries in the docket search?
- A19.** Find the industry list on the docket search page. Then hold down the Ctrl button and click on each industry you want to include. The highlighted industries will be included in the search. (To unselect an industry, hold the Ctrl button and click again.) Only one industry can be selected in the company and document searches.
- Q20.** Can I use the Summary of Orders and Filings to find a company annual report?
- A20.** Annual report filings are not listed in the Summary of Orders and Filings because there are so many company annual reports filed in a short time period. Annual report filings can be found by doing a docket or document search for docket type A - Annual Reports. Other filings that are not listed in the Summary unless they are Board Orders include Customer Contribution Fund (CCF-docket) filings, Report (R-docket) filings, and Miscellaneous (M-docket) filings.
- Q21.** Once I have started to add documents to my filing, can I use the Browser back button to go back to edit information I entered on the previous screen?
- A21.** No, if you need to make changes to the information you entered about the filing once you've begun to add documents, you must cancel the filing and start again. Using the back button in the browser will cause unexpected results and is likely to cause your filing to be incomplete.

- Q22.** What happens if I forget to hit the submit filing button?
- A22.** If you have added documents to your filing and you close your browser without hitting either the submit filing or cancel filing buttons, or you leave your browser open for more than 30 minutes with no activity, Records Center may receive an incomplete filing. Records Center will generally try to contact filers with an incomplete filing that has been in the processing area for longer than 30 minutes during regular business hours.
- Q23.** Can I file a zipped file in EFS?
- A23.** Although it is possible to upload a zipped file into EFS, a filing containing a zipped file will be rejected. The documents in a filing must be viewable without having to be unzipped. For more information about the IUB electronic information standards, see the [Standards for Electronic Information](#) link on the EFS home page.
- Q24.** Can I file a password protected file in EFS?
- A24.** Although it is possible to upload a password protected file into EFS, a filing containing a password protected file will be rejected. The documents in a filing must be viewable without having to be unprotected. For more information about the IUB electronic information standards, see the [Standards for Electronic Information](#) link on the EFS home page.
- Q25.** Can I file one or more MS Excel workbooks containing live links in EFS?
- A25.** Although it is possible to upload a set of linked workbooks into EFS, the links between files will not work once they have been processed in EFS. Links between spreadsheets within a single workbook will work in EFS.
- Q26.** Can I combine multiple petitions into one document?
- A26.** Each document submitted into EFS will be assigned a single document type. For ease of processing and retrieval, it is preferred that requests for waiver be submitted as separate documents within the filing. The waiver request document can then be easily associated with the waiver docket that must be created. Similarly, petitions to intervene will be more easily tracked as an intervention document type if they are submitted as a separate document within the filing.
- Q27.** Please provide some advice on submitting scanned documents.
- A27.** If a document is available electronically in a native format (MS Word, MS Excel, WordPerfect, etc.), please submit the document instead of printing and scanning it. If a document is not available electronically, please scan it to be word searchable, if possible.
- Q28.** How can I make a filing with many documents easier to navigate and submit?
- A28.** When preparing to file a large filing such as a rate case, contact the EFS Help Desk for suggestions on how to make the filing. Please submit a large filing as multiple submissions of approximately 50 documents. Clearly label each piece of the large filing as 1 of X, 2 of X, and include an index of the whole case with the first filing. Attachment 2 to this document provides suggestions to filers, including information about large filings.

- Q29.** My filing has been accepted and I want to withdraw it. What do I need to do?
- A29.** Once a filing has been accepted, the filer must file a request to withdraw the filing.
- Q30.** I have submitted a filing that contains only confidential information. What notices are sent?
- A30.** For a filing that contains only confidential information (such as a response to a survey that the Board has held confidential by order), only the filer will receive notification that the filing has been accepted. Only Board staff and Office of Consumer Advocate staff will be able to view the confidential documents.
- Q31.** I have information to file that pertains to multiple dockets. How do I submit that information?
- A31.** If the Board has formally consolidated dockets into one, parties will receive notice of the consolidation and will only need to file once in the consolidated docket. Prior to actual consolidation, parties must file in each affected docket.
- Q32.** Who do I call if I have an issue with filing electronically?
- A32.** The EFS Help Desk is available to answer your questions by phone or email during regular business hours Monday through Friday, 8 am to 4:30 pm, except [State Holidays](#).
Phone: (515) 725-7337, E-Mail: [EFS Help Desk](#).
- Q33.** Are there dockets with information about EFS?
- A33.** A new docket will be created each calendar year and information about EFS will be posted into those dockets. As of this revision, existing dockets are: [EFS-2011-0001](#); [EFS-2010-0001](#); and [EFS-2009-0001](#).

Attachment 1: Sample Cover Letter

Company Letterhead

Date

Executive Secretary
Iowa Utilities Board
1375 East Court Avenue, RM 69
Des Moines, IA 50319-0069

RE: ***Company Name*** (INITIAL FILING)
Docket No. (***Docket Number***)

Dear Executive Secretary:

Enclosed please find (***Company's***) (***description of filing***) (***optional -- for the period beginning date, ending date***), as filed today on EFS.

[Include any other information needed by the Board to properly identify and process the information in the filing.]

Very truly yours,

/s/ Name of Person Responsible for the Filing

Name of Person Responsible for the Filing
Title of Filer

Attachment 2: Suggestions for Filers:

1. Contact the IUB EFS Help Desk (efshelpdesk@iub.iowa.gov or (515) 725-7337) with any questions or to request assistance in planning for a major filing.
2. Be sure to read and follow 199 IAC 14 rules for electronic filings, including signatures, requests for confidential treatment, and service.
3. For most filings, describe the filing, including docket number (if known) and reason for the filing, in a cover letter. A cover letter is not needed for outage reports or certain other routine filings. When in doubt, include a cover letter.
4. Add the company to the filing information on the EFS filing screen. Select or type in the company making the filing and then click the 'Add' button. Just selecting the company does not automatically add it to the filing.
5. Use good filing and document titles. Use a unique document title for each document in the filing. See examples in the IUB [Standards for Electronic Filing](#) and in the [Document Titles Report](#) in EFS-2010-0001.
 - a. The Board prefers that testimony documents have titles in the following form: (Witness Last Name) (Type of Testimony) Testimony
 - b. The Board prefers that exhibit documents have titles in the following form: (Witness Last Name) Exhibit (Number) (Topic)
 - c. For consistency, the Board prefers that workpapers have titles in the following form: (Witness Last Name) (Company) Workpaper (Topic)
6. Do not file multiple copies of the same document in a filing or case.
7. File both a public (redacted) and a confidential version of documents for which confidential treatment is being requested. For pairs of documents (confidential and public), add "confidential" or "public" to the document title so the two document titles are similar but not identical.
8. Be careful to follow rules and suggestions for confidential information and to make sure that redaction techniques for public versions are not reversible or penetrable. See [199 IAC 14.12](#) and [EFS FAQs](#) for more information.
9. Documents must not be password protected and must be filed according to the IUB [Standards for Electronic Filing](#).
10. Documents that are primarily text should be filed as MS Word documents or word-searchable PDF files. Documents filed in PDF format should be reviewed by the filer before filing to assure that pages are rotated so they are "right-side-up" when viewed on a computer screen.
11. The IUB standard for MS Office is currently MS Office 2007. It is recommended that documents and spreadsheets be submitted in MS Office 2000-2003 format for maximum usability.
12. Spreadsheets, workbooks, and databases must be filed in native format and must include all cell formulae and cell references. See the [Standards for Electronic Filing](#) for more information. Also see [199 IAC 14](#) and [EFS FAQs](#) for information about confidential treatment.

13. IUB is unable to accept linked documents as they will not work in the electronic filing system. Links among tabs within a single spreadsheet may work but links between documents or spreadsheets in separate documents will not.
14. Although hyperlinks may be included in a document as an aid to the reader, the material referred to by the hyperlinks is not considered part of the official record or filing unless the material itself is filed. Hyperlinks to cited authority may not replace standard citation format for constitutional citations, statutes, cases, rules, or other similarly cited materials. [199 IAC 14.5\(9\)](#)
15. Do not scan documents if you can submit a native electronic file. If scanning is necessary, whenever possible make sure the scanned file is word searchable. If a PDF file is submitted, whenever possible make sure the PDF file is word searchable. Documents filed in PDF format should be reviewed by the filer before filing to assure that pages are rotated so they are “right-side-up” when viewed on a computer screen.
16. Be careful in selecting or including the docket number.
17. If a waiver request is needed, file waiver requests as separate documents, and, when possible, as separate filings, clearly indicating the relationship with the primary docket in which the waiver is requested. Check the rules to make sure a request for waiver is needed.
18. Break large filings (groups of documents) into multiple submissions of approximately 50 documents. Clearly label each piece of the large filing as Part 1 of X, Part 2 of X.
 - a. Filings with more than 150 documents should be broken into logical smaller filings of approximately 50 documents for easier filing and processing. If a case is submitted as more than one filing, the filer should include at the end of the filing title of each filing “Part x of xx”, so IUB Records and Information Center will know that all parts have been received.
 - b. All large or multi-part filings should include an index of the whole case with the first filing.
 - c. If the case includes tariffs, please put the documents associated with the tariffs in separate filings – one for interim and another filing for the full case. Be sure the tariff filings are clearly identified as being associated with the case.
 - d. The filing should be organized to minimize duplication of files within the filing, or across filings, if the case is filed in pieces
 - e. Documents must be clearly named so users can quickly identify what the document is and what information it contains. See the [Standards for Electronic Information](#) or the [Document Titles Report](#) in EFS-2010-0001 for examples of names for documents and filings. The IUB Records and Information Center staff will assign document types to the documents in the filing. Appropriate naming of the documents will facilitate that process.
 - i. Each document in the filing must have a unique document title. For pairs of documents (confidential and public), add “confidential” or “public” to the document title so the two document titles are similar but not identical.
 - ii. Put the confidential and public versions of a document in the same filing so Records Center will know that both have been filed. Confidential documents will be viewable only to IUB staff and staff from the Office of Consumer Advocate. Confidential documents are not viewable by external users, including the original filer.

- iii. Testimony, exhibits, and workpapers should have document titles that begin with the last name of the witness. (See [item 5](#) above, [Standards for Electronic Filing](#), and [Document Titles Report](#).)
 - f. Computer files (documents) should be no larger than 5 MB. If computer files (documents) must be split because of size, be sure to name the pieces so they can be identified and reconstructed logically and easily by other EFS users and Board staff.
 - g. If confidential information is contained in the filing, the filer must be sure to follow Board rules on confidential information by including a request for confidential treatment, providing public versions of all confidential documents, and naming the files and documents in accordance with Board rules ([199 IAC 14.12](#)).
 - h. Combine certain documents into one computer file where it makes sense to do so. For example:
 - i. Group 10-Ks together in one document and group 10-Qs together into one document.
 - ii. Group Monthly Management Reports into a smaller number of documents by combining all reports for one year into one computer file.
 - iii. Combine tax returns into a few computer files. Although these files will be larger, they will only be accessed by IUB and OCA because they are confidential.
19. Be sure to read and follow [199 IAC 14](#) rules electronic filings.
20. Contact the IUB EFS Help Desk (efshelpdesk@iub.iowa.gov or (515) 725-7337) with any questions or to request assistance in planning for a major filing.